

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BEVERLY JEAN GIBSON, Debtor

**Case No. 22-02640-JAW
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Dismiss (dk # 51) as follows:

1. Debtor commenced this case on December 21, 2022 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor has filed a Motion to Modify the plan term from 36 months to 60 months (Dk# 55).

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 1, 2025, to:

By Electronic CM/ECF Notice:

Harold Barkley

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.